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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,)
18 Plaintiff,)
19 v.)
20 DEBRA EDISON,)
21 Defendant.)
22 _____)

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24 **STIPULATION AND [PROPOSED]
25 ORDER EXCLUDING TIME &
CONTINUING HEARING**

26 The above-captioned matter came before the Court on October 16, 2007. The defendant
27 was represented by Shawn Halbert, Esq., and the government was represented by Jeffrey Finigan,
28 Assistant United States Attorney. The matter was set before this Court for jury trial on February
4, 2008, at 7:30 a.m.

29 The Court made a finding that the time from and including October 16, 2007, through and
30 including February 4, 2008, should be excluded under the Speedy Trial Act, 18 U.S.C.
31 § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best

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33 STIPULATION AND [PROPOSED] ORDER
34 EXCLUDING TIME
35 CR 07-0479 WHA

1 interest of the public and the defendant in a speedy trial. The finding was based on the need for
2 the defendant to have reasonable time necessary for effective preparation, taking into account the
3 exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C.

4 § 3161(h)(8)(B)(iv).

5 The parties hereby agree to and request that the case be continued until February 4, 2008,
6 and that the exclusion of time until then be granted. The parties agree and stipulate that the
7 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),
8 because the ends of justice served by this continuance outweigh the best interest of the public and
9 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively
10 prepare, taking into account the exercise of due diligence, and will provide for continuity of
11 counsel for the defendant.

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13
14 DATED: October 16, 2007

/s/

15 SHAWN HALBERT
Counsel for Debra Edison

16
17 DATED: October 16, 2007

/s/

18 JEFFREY R. FINIGAN
Assistant U.S. Attorney

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20 So ordered.

21 DATED:

22 WILLIAM H. ALSUP
UNITED STATES DISTRICT COURT JUDGE